

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*

Plaintiffs,

v.

National Football League and
NFL Properties LLC,
successor-in-interest to
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

DECLARATION OF ROBERT C. WOOD

ROBERT C. WOOD declares, pursuant to 28 U.S.C. § 1746, based upon his personal knowledge, information, and belief, the following:

1. I am the individually-retained counsel for Class Member, William E. White, in the above-referenced action, and I am fully familiar with the matters set forth herein.
2. I submit this Declaration in response to the Declaration of Joseph R. Genovesi, filed on May 8, 2018 (ECF No. 9973-1), and in support of Co-Lead Class Counsel's request to permanently enjoin Thrivest Specialty Funding, LLC.

No. 2:12-md-02323-AB

MDL No. 2323

Hon. Anita B. Brody

3. Neither I, nor anyone else in my office, negotiated or otherwise advised Mr. White in connection with the purported assignment. Indeed, the Attorney Acknowledgement and Notice of Assignment that Thrivest drafted, which I signed, so states that "I did not represent him/her, nor was I was (sic) involved in negotiating and/or advising Mr. White in regard to that transaction." See ECF No. 9924-2, at 56. Mr. White purportedly entered into the assignment agreement on December 8, 2016, and I signed the Attorney Acknowledgement on December 19, 2016.

4. Contrary to Mr. Genovesi's contention, at paragraph 13 of his Declaration, I did not seek to limit or cap the amount of Mr. White's advance.

5. I have never spoken to Mr. Genovesi, nor has anyone in my office.

6. Despite requests from Thrivest, Mr. White neither provided case updates nor did he otherwise act in any manner that ratified the purported assignment following the Court's December 8, 2017 Explanation & Order (ECF No. 9517).

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 9, 2018

/s/ Robert C. Wood
ROBERT C. WOOD
Counsel for Class Member, William E. White

CERTIFICATE OF SERVICE

I, Christopher A. Seeger, hereby certify that a true and correct copy of the foregoing Declaration of Robert C. Wood was served via the Court's electronic filing system on the date below upon all counsel of record in this matter.

Dated: May 9, 2018

Respectfully submitted,

/s/ Christopher A. Seeger

Christopher A. Seeger
SEEGER WEISS LLP
55 Challenger Road, 6th Fl
Ridgefield Park, NJ 07660
Phone: (212) 584-0700
Fax: (212) 584-0799

Co-Lead Class Counsel